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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
GABRIEL QUINTERO,  
  
Defendant.

CASE NO. 2:24-MJ-00108

STIPULATION FOR EXTENSION OF TIME FOR  
PRELIMINARY HEARING PURSUANT TO RULE  
5.1(d) AND EXCLUSION OF TIME

Plaintiff United States of America, by and through its attorney of record, Assistant United States Attorney Emily G. Sauvageau, and defendant Gabriel Quintero, both individually and by and through his counsel of record, Mark Reichel, hereby stipulate as follows:

1. The Complaint in this case was filed on September 17, 2024, and defendant first appeared before a judicial officer of the Court in which the charges in this case were pending on September 18, 2024. The court set a preliminary hearing date of October 2, 2024.

2. By this stipulation, the parties jointly move for an extension of time of the preliminary hearing date to October 17, 2024, at 2:00 p.m., before the duty Magistrate Judge, pursuant to Rule 5.1(d) of the Federal Rules of Criminal Procedure. The parties stipulate that the delay is required to allow the defense reasonable time for preparation, for the government's continuing investigation of the case, and for the parties to discuss initial discovery and potential disposition of the case. The parties further agree that the interests of justice served by granting this continuance outweigh the best interests of the public

1 and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

2 3. The parties agree that good cause exists for the extension of time, and that the extension  
3 of time would not adversely affect the public interest in the prompt disposition of criminal cases.  
4 Therefore, the parties request that the time between October 2, 2024, and October 17, 2024, be excluded  
5 pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), Local Code T-4.

6 IT IS SO STIPULATED.

7  
8 Dated: September 20, 2024

PHILLIP A. TALBERT  
United States Attorney

9  
10 /s/ Emily G. Sauvageau  
EMILY G. SAUVAGEAU  
Assistant United States Attorney

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12  
13 Dated: September 20, 2024

/s/ Mark Reichel  
MARK REICHEL  
Counsel for Defendant  
Gabriel Quintero

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CASE NO. 2:24-MJ-00108

FINDINGS AND ORDER EXTENDING TIME FOR  
PRELIMINARY HEARING PURSUANT TO RULE  
5.1(d) AND EXCLUDING TIME

The Court has read and considered the Stipulation for Extension of Time for Preliminary Hearing Pursuant to Rule 5.1(d) and Exclusion of Time, filed by the parties in this matter on September 20, 2024. The Court hereby finds that the Stipulation, which this Court incorporates by reference into this Order, demonstrates good cause for an extension of time for the preliminary hearing date pursuant to Rule 5.1(d) of the Federal Rules of Criminal Procedure.

Furthermore, for the reasons set forth in the parties' stipulation, the Court finds that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The Court further finds that the extension of time would not adversely affect the public interest in the prompt disposition of criminal cases.

THEREFORE, FOR GOOD CAUSE SHOWN:

1. The date of the preliminary hearing is extended to October 17, 2024, at 2:00 p.m.
2. The time between October 2, 2024, and October 17, 2024, shall be excluded from

1 calculation pursuant to 18 U.S.C. § 3161(h)(7)(A).

2 3. Defendants shall appear at that date and time before the Magistrate Judge on duty.

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4 IT IS SO ORDERED.

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6 Dated: September 20, 2024



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8 CAROLYN K. DELANEY  
9 UNITED STATES MAGISTRATE JUDGE  
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